

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SEUNGMAN KIM,)	
)	
Plaintiff,)	CIVIL ACTION NO. 2:22-cv-367-JRG
)	
v.)	JURY TRIAL DEMANDED
)	
SAMSUNG ELECTRONICS CO., LTD., and)	
SAMSUNG ELECTRONICS)	
AMERICA, INC.,)	
)	
Defendants.)	

JOINT MOTION FOR ENTRY OF AGREED DISCOVERY ORDER

Pursuant to the Court’s Order (Dkt. 8), dated October 21, 2022, Plaintiff Seungman Kim and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., hereafter referred to as “the Parties”, jointly and respectfully move for entry of the parties’ Agreed Discovery Order attached hereto.

Dated: December 8, 2022

Respectfully submitted,

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SAMSUNG ELECTRONICS COMPANY,
LTD. AND SAMSUNG ELECTRONICS
AMERICA, INC.

CERTIFICATE OF CONFERENCE

This is to certify that counsel have conferred concerning this Joint Motion and this Joint Motion sets out the Parties' positions.

/s/ Jennifer P. Ainsworth
Jennifer P. Ainsworth

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically on December 8, 2022. As such, this document was served on all counsel of record who are deemed to have consented to electronic service.

/s/ Jennifer P. Ainsworth
Jennifer P. Ainsworth